

FILED  
CLERK'S OFFICE

2005 09 07 PM 2:55

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

U.S. DISTRICT COURT  
DISTRICT OF MASS.

UNITED STATES OF AMERICA,

v.

CIVIL ACTION  
NO: 05-10401-RCL

DELIA J. BAEZ

**AFFIDAVIT OF COUNSEL**

I, William Keefe, on oath and affirmation state the following:

1. I am counsel for Delia Baez in an unrelated civil matter concerning the forfeiture of money from her.
2. I am filing a Notice of Appearance with this Motion to Remove Default and Answer of Defendant Delia Baez to the Complaint.
3. I was on trial in the United States District Court in the District of Connecticut during May and June in a criminal case. I was unable to make time to respond to the complaint during those months. Since that time I have been on vacation and have been involved in other criminal litigation, and have failed to make a timely response to the plaintiff's complaint in this matter.



Signed under the penalties of perjury, this 29<sup>th</sup> day of August, 2005.

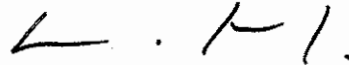
8/29/05  
Date

L. H.  
**WILLIAM KEEFE**  
BBO # 556817  
390 Centre Street  
Jamaica Plain, MA 02130  
Telephone (617) 983-9200  
Facsimile (617) 983-0733



**CERTIFICATE OF SERVICE**

I, William Keefe, hereby certify that a copy of the enclosed Notice of Appearance, Motion to Remove Default, Answer of Delia Baez to the Complaint, Affidavit of Counsel, and Certificate of Conference, were hand delivered to Anita Johnson, Assistant United States Attorney, at the Office of the U.S. Attorney, One Courthouse Way, Ninth Floor, Boston MA, 02201, on August 30, 2005.



---

William Keefe